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April 19, 2019

VIA ECF AND HAND DELIVERY

Hon. Vernon S. Broderick
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Courtroom 518
New York, NY 10007

Re: *Sprint et al. v. AT&T Mobility LLC*, Case No. 19-cv-1215 (VSB)

Dear Judge Broderick:

We represent plaintiffs Sprint Spectrum L.P., SprintCom, Inc., and Sprint/United Management Company (collectively, “Sprint”) in the above-referenced action. Pursuant to the Court’s Order, dated April 4, 2019 (ECF No. 66), and the Court’s Individual Rule 5.B, this letter sets forth the bases for the proposed redactions to the publicly filed versions of: (1) Sprint’s reply memorandum of law in support of its motion for preliminary injunction, including supporting declarations and exhibits; and (2) Sprint’s memorandum of law in support of its motion *in limine* to preclude the testimony of AT&T’s expert witness, Peter Golder, including supporting declaration and exhibit. Sprint filed these papers under seal on April 17, 2019.

Nearly all of the information that Sprint seeks to redact is from documents that Defendant AT&T Mobility LLC (“AT&T”) designated either “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” under the Agreed Protective Order (“Protective Order”). ECF No. 54. With one exception noted below, this is the same information that Sprint redacted from its original moving papers pursuant to the Court’s endorsement of Sprint’s letter request, dated April 10, 2019. ECF No. 82.¹ Sprint also seeks to redact any information that AT&T redacted from its opposition papers, pursuant to the Court’s endorsement of AT&T’s request. ECF No. 99. Finally, Sprint seeks to redact the deposition testimony of Peter Golder, and any references to that testimony, which AT&T designated “Highly Confidential – Attorneys’ Eyes Only.” Pursuant to paragraph 16 of the Protective Order, Sprint is required to file such documents under seal and seek to redact the confidential information.

¹ Sprint incorporates by reference the legal basis for sealing information, including competitive and proprietary trade secrets, set forth in its April 10, 2019 letter. ECF No. 75.

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Respectfully submitted,

/s/ Craig B. Whitney

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